1/8

MDNR comment # I.

- Monsanto is able to Monitor inlet/exit scrubber pH. They do not propose to use it as an interlock. They do propose scrubber water flow and scrubber recycle flow as interlock. If max. chlorine condition established, would the water flows suffice rather than ~~test~~ pH? demonstrated

Interlocks

- ~~Shall~~ Should we spell ~~as~~ out CO policy?
- They propose low combustion air flow no max. combustion flow
- They have low waste flow instead of maximum

TCHC

- No plans, currently for monitor what rational do we provide to require one?

Incinerability limits

- will UDRI listing be used as permit condition along with heat of combustion

- No Provisions to do Audit Cylinder

JOHN ASHCROFT
Governor

FREDERICK A. BRUNNER
Director

STATE OF MISSOURI
DEPARTMENT OF NATURAL RESOURCES
DIVISION OF ENVIRONMENTAL QUALITY
P.O. Box 176
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Division of Energy
Division of Environmental Quality
Division of Geology and Land Survey
Division of Management Services
Division of Parks, Recreation,
and Historic Preservation

DRAFT

July 20, 1988

Mr Robert Boland

Dear Mr. Boland:

Re: Trial Burn Plan for Monsanto-Queeny Incinerator

This is in reply to your submittal of the revised trial burn plan for the CAC incinerator. Please address the comments and questions contained in this letter prior to initiating the trial burn.

1. Since the existing pollution control equipment does not provide for acid neutralization, emphasis should be placed on monitoring process water pH. An interlock will be imposed under a permit based upon the lowest pH demonstrated during a successful trial burn. With that in mind, you should revise tables IV-2 and IV-3 to include pH.

2. Table IV-2 indicates that the oxygen and CO monitors are to be installed for the trial burn. If the monitors described on page 26 are only for the trial burn, future operating monotors will have to be correlated to those used in a successful trial burn.

3. As a note of clarification on page 23, 40 CFR 264.347(c) requires that the shut-off systems, as well as the alarms, be tested.

4. Specific stack traverse points should be designated.

5. You should further justify the single tank sample proposed on the basis of the recycle loop. How long must the recycle line be operating continuously to assure a homogeneous waste mixture in the feed tank? What analytical evidence supports this position?

Monsanto-Queeny should respond to these points and submit appropriate revisions to the department in writing. You may then schedule the trial burns at your earliest convenience. Staff from the department and EPA Region VII should be informed of the trial burn dates as soon as possible in order to clear possible conflicts. If you have any questions regarding this letter, please contact me.

Sincerely,

Monsanto - Queeny Trial Burn

POHCs: Tetrachloroethylene (Spiked)
1,2 dichloroethane (In waste)
Based on Heat of Comb. and UDRI

- 17 million Btu/hr Liq Injection
- Max rate 1400 lbs/hr
- APCE is Scrubber/absorber

- Summary of proposed Trial Burn Conditions attached.

TABLE V-2. SUMMARY OF TEST CONDITION PARAMETER TARGETS FOR CAC INCINERATOR SYSTEM

Incinerator system parameter	Test condition 1	2	3
Waste type(s)	CAC	CAC	CAC
Operation mode	normal	low	maximum
Waste feed rate (lb/hr)	1100	800[a]	1400[a]
POHC feed rate (lb/min) Perc	0.367	0.267	0.467
EDC	0.330	0.240	0.420
Chlorine feed rate (lb/hr)	407	296	518
Ash feed rate (lb/hr)	TBD	TBD	TBD
Waste heat input (mmBtu/hr)	9.086	6.608	11.564
Auxiliary fuel (mmBtu/hr)	2.275	2.275	2.275
Combustion air (scfm)	3300	3300	3300
Oxidizer temperature (^{o}C)	900-950	980-1040	1050-1080
O_2 in stack gas (%)	TBD[b]	TBD	TBD
CO in stack gas (ppmv)	TBD	TBD	TBD
Quench water flow (gpm)	25	25	25
Scrubber water flow (gpm)	140	140	140
Scrubber recycle flow (gpm)	50	50	50

[a] Will become set according to oxidizer temperature.
[b] To be determined during trial burn tests.